

### **REMARKS/ARGUMENTS**

Claims 1-42 are pending and at issue in the present application.

Applicants have amended the title to read “Book Production Apparatus And Method For Producing Books With Demand Printer” to render the title more descriptive.

Applicants traverse the rejections of claims 14-22 as indefinite. Contrary to the examiner’s contention, claim 14 does not recite “the folded printed sheets.” Accordingly, applicants have not amended any of claims 14-22 in connection with this rejection.

Applicants traverse the rejections of claims 1 - 42 as anticipated by or obvious over one or more of Dooley, Graushar, Weller, and Warmus et al.

Claim 1, and claims 2-22 dependent directly or indirectly thereon, as amended, recite a book production apparatus. The book production apparatus comprises a gathering line operable during a single production sequence and a demand printer operable during the single production sequence for producing first and second printed pages. Each printed page has unique content that may be positioned at any point over the entire surface thereof. The apparatus further includes a feeding device operable to feed the printed pages to the gathering line and a controller that coordinates operation of the gathering line, the demand printer, and the feeding device during the production sequence to produce books.

Claim 23, and claims 24 - 35 dependent directly or indirectly thereon, as amended, specify a book production apparatus. The apparatus comprises a gathering line operable during a production sequence and a demand printer for producing first and second different customized pages. Each customized page has unique content that may be positioned at any point over an entire surface thereof wherein the first and second customized pages are printed during a time interval during which the gathering line is continuously moving. The apparatus further includes a feeding device operable to feed the customized pages to the gathering line and a controller that coordinates operation of the gathering line, the demand printer, and the feeding device during the production sequence to produce customized books.

Claim 36, and claims 37 – 42 dependent directly or indirectly thereon, as amended, recite a method of producing books. The method comprises the steps of supplying a gathering line, a plurality of feeding devices, and a plurality of demand printers for producing first and second pages. Each page has unique content that may be positioned at any point over an entire surface

thereof in response to print commands generated during a continuous production sequence. The method further includes coordinating a simultaneous operation of the gathering line, the demand printers, and the feeding devices during a production sequence to produce the books.

None of the prior art teaches or suggests a book production apparatus having a demand printer operable during a single production sequence for producing first and second different printed pages each having unique content that may be positioned at any point over an entire surface thereof, as specified by the claims 1-22 at issue.

Furthermore, none of the prior art teaches or suggests a book production apparatus comprising a demand printer for producing first and second different customized pages each having unique content that may be positioned at any point over an entire surface thereof, wherein the first and second customized pages are printed during a time interval during which the gathering line is continuously moving, as specified by claims 23-34 at issue.

In addition, none of the prior art teaches or suggests a method of producing books comprising the step of supplying a plurality of demand printers for producing first and second pages each having unique content that may be positioned at any point over an entire surface thereof in response to print commands generated during a continuous production sequence, as recited by claims 36-42 at issue.

In fact, Dooley discloses a multiple signature feeder system that produces customized or personalized books. The feeder system is operatively associated with at least one of a plurality of packer boxes and includes a feed conveyor and a plurality of feeder boxes. Each feeder box is adapted to deliver a distinct signature to the associated packer box. Each of the signatures delivered from the feeder system has a blank reserved portion. A printer is positioned to apply a printed message to the reserved portion of the selected signature prior to delivery to the associated packer box. The present invention enables a degree of variability that is not afforded by Dooley.

Graushar discloses an apparatus and method of processing signatures. In Graushar, a printing system may be used to replace one or more signature feeders where it is desired to provide customized printing of signatures. The specification states that: "The ink jet heads 120 are ultimately controlled by a system computer 31, and in accordance with conventional techniques, generally function to print one or two lines per head." Column 6, lines 7-9. Graushar

further states that "...adjustment of an individual [inkjet] head 120 may thereafter be made by using the locking knobs 126 so that the heads may be positioned as desired..." Column 6, lines 19–21. Furthermore, Graushar states that "... this structure advantageously provides that a signature 16 selectively routed and particularly oriented upon conveyor belt 106 can be produced with personalized or tailored message ..." Column 6, lines 22–26. Because the ink jet head(s) of Graushar are mechanically positioned Graushar's printing system is limited to printing messages at a fixed location and in a fixed orientation during a production run. Graushar's printing system is incapable of printing pages having unique content at different positions on the pages without stopping the production sequence and physically adjusting the location of the ink jet heads.

Weller discloses a signature machine for feeding folded signatures having inside pages with printed messages to a signature gatherer. The printers in Weller are mechanically positioned to apply a printed message to a specified portion of a pre-printed page. Therefore, Weller suffers from the same deficiencies as was noted with respect to the system disclosed in Graushar.

Warmus et al. discloses an apparatus and method for controlling an electronic press to print fixed and variable information. While Warmus et al. does disclose a system that can print pages with full variability, there is no disclosure or suggestion that the system disclosed therein could be combined with any of the systems disclosed in the remaining references to arrive at the systems and methods claimed in the present application. Specifically, the system disclosed in Warmus et al. is designed to produce books at an output of an electronic press. That is, pages are sheeted, folded, stitched and/or otherwise processed by devices that directly receive the printed materials. There is no disclosure or suggestion in Warmus et al. that the printed materials may comprise a portion of a finished book, and that the printed materials may be provided to an accumulator, such as a packer box, which feeds a gathering line that combines the printed materials with other book portions to form a completed book.

In addition, none of Dooley, Graushar, or Weller discloses or suggests that it would be desirable, or even possible, to modify the systems disclosed therein to substitute an electronic press system for the ink jet printers disclosed by such references. In fact, applicants contend that the non-obviousness of the subject matter recited by the claims at issue is strongly supported by the decade of time that has passed since the filing of the Warmus et al. patent application and the fact that no one else has suggested the claimed combinations over that long period of time.

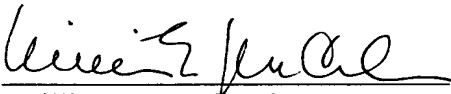
Because the prior art does not disclose each of the elements recited by the claims at issue, it follows that such claims are not anticipated thereby.

Additionally, because none of the art discloses or suggests that it would have been possible to implement a book production apparatus or method as specified by claims 1-42 of the present application, it is evident that the claims are not obvious thereover. The prior art must disclose at least a suggestion of an incentive for the claimed combination of elements in order for a prima facie case of obviousness to be established. See *In re Sernaker*, 217 U.S.P.Q. 1 (Fed. Cir. 1983) and *Ex Parte Clapp*, 227 U.S.P.Q. 972, 973 (Bd. Pat. App. 1985). Accordingly, the rejection of the claims at issue should be withdrawn.

For the foregoing reasons, reconsideration and allowance of the foregoing claims are respectfully requested.

Respectfully submitted,

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